

# Iowa Department of Natural Resources

## Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 22.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

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The Iowa Department of Natural Resources (DNR) finds that:

1. Harsco Metals, located at 1770 Bill Sharp Blvd., Muscatine, IA 52761 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Mr. Edward Ramsey.
2. Harsco Metals is a slag processing facility. This facility consists of 5 emission points and 48 emission units with potential emissions of:

| Pollutant                                    | Abbreviation     | Potential Emissions<br>(Tons per Year) |
|--|------------------|--|
| Particulate Matter ( $\leq 10 \mu\text{m}$ ) | PM <sub>10</sub> | 16.10                                  |
| Particulate Matter                           | PM               | 16.10                                  |
| Sulfur Dioxide                               | SO <sub>2</sub>  | 4.76                                   |
| Nitrogen Oxides                              | NO <sub>x</sub>  | 39.40                                  |
| Volatile Organic Compounds                   | VOC              | 4.01                                   |
| Carbon Monoxide                              | CO               | 10.57                                  |
| Hazardous Air Pollutants <sup>(1)</sup>      | HAP              | 0.03                                   |

<sup>(1)</sup> May include the following: formaldehyde, benzene and acetaldehyde.

3. Harsco Metals submitted a Title V Operating Permit renewal application on December 18, 2017 and additional information on February 23, 2018. Based on the information provided in these documents, the DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 22.107.  
The DNR has complied with the procedures set forth in 567 IAC 22.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

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DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the proposed permit will run from March 28, 2018 until April 27, 2018. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period. During this time, anyone may submit written comments on the permit. Mail signed comments to John Woodland at the DNR address shown below.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. The DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to John Woodland at the DNR address shown below.
3. The DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

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DNR concludes that:

1. The DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-31, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. The DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 20-31.
4. The DNR is required to comply with 567 IAC Chapter 22 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

**Facility:** Harsco Metals  
**EIQ#:** 92-2868  
**Facility #:** 70-01-054  
**Reviewer:** John Woodland

Harsco Metals has applied for a Part 70 Title V Permit renewal. The application was submitted on December 18, 2017.

The facility handles the scrap steel, processes the waste slag for SSAB Iowa, Inc., and is located adjacent to the SSAB facility. Because it is adjacent to, handles the steel going to the SSAB electric arc furnace and the slag coming from the furnace, it and SSAB are considered one facility for PSD and Title V purposes.

Sources of emissions are scrap steel handling, slag handling (dumping, conveying, crushing and screening), a gasoline tank and diesel engine powered generators. The facility has six emission points (mostly fugitive sources), covered by construction permits, and one gasoline tank that is unpermitted and subject to 40 CFR 63 Subpart CCCCCC.

### **Changes Since Last Permit**

All references to “MultiServ” have been removed from the permit.

Slag Screening Plant (EP-Q5P) and Jaw Crusher (Q5P2):

- DNR Construction Permit 04-A-1063-S3 is the current permit number for emission point Q5P. Q5P operating requirements with associated monitoring and recordkeeping were changed.
- DNR Construction Permit 02-A-840-S1 was rescinded. The jaw crusher, Q5P2 is no longer in service.

Nonemergency Portable Diesel Engine Generators (Q5DE and Q53):

- The current DNR Construction Permits are 04-A-1064-S3 and 05-A-493-S2 for the Nonemergency Portable Diesel Engine Generators. Operating limits and operating condition monitoring and recordkeeping were changed. The engines have been identified as portable engines.
- The engine, EP Q5DE is not subject to 40 CFR Part 60 NSPS Subpart IIII, because the engine was manufactured in 1988. The engine, EP Q53 is not subject to 40 CFR Part 60 NSPS Subpart IIII, because the engine was manufactured in 1991.
- This equipment is not subject to the following federal regulation: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE NESHAP) [40 CFR Part 63, Subpart ZZZZ]. At this time, the engines have been categorized as portable engines; hence, they are not subject to this NESHAP. However, if the engines stay at the same location for over 12 months, they could become subject to the rule.

### Steel Scrap Handling Yard (SCRAP):

- DNR Construction Permit 95-A-561-S2 is the current permit number for emission point SCRAP. The changes to the construction permit updated operating conditions and removed wet suppression.

In November 2008, the facility's six construction permits were modified to reduce allowable operating hours from 14 hours per day to 8 hours per day.

### Fugitive Dust Control Plan

A fugitive dust control plan is a requirement for any of the emission points/units that produce dust. The "plan" is contained in the Appendix of the Title V permit.

### Potential Emissions

Potential emissions, primarily set by construction permits, remain virtually unchanged.

### National Emission Standards for Hazardous Air Pollutants (NESHAP)

The equipment at this facility is not subject to the requirements of 40 CFR Part 63, Subpart YYYYYY, National Emission Standards for Hazardous Air Pollutants for Area Sources: Electric Arc Furnace Steelmaking Facilities. The requirements of §63.10685, "*What are the requirements for the control of contaminants from scrap?*" apply to the owner/operator (SSAB Iowa, Inc.) of the electric arc furnace (EAF).

The gasoline storage tank (EP GASOLINE) at this facility is subject to 40 CFR 63 Subpart CCCCCC National Emission Standards for Hazardous Air Pollutants for Area Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities. This is a 2,000 gallon gasoline tank. It was considered insignificant in the first TV Permit, but is now subject to 40 CFR 63 Subpart CCCCCC.

### Program Applicability

**CAM:** None of the emission sources at Harsco Metals are subject to CAM. The primary emitters are the scrap handling and slag handling, and their potential uncontrolled particulate emissions are well under 100 tons per year.

**Acid Rain:** The source is not subject.

**PSD:** Not major for PSD by itself, but combined with SSAB Steel, the "one facility" is major for PSD purposes.

**Stratospheric Ozone:** Not subject.

**112(r):** Not subject.